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April 6, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Application of Duke Energy Progress, LLC for Adjustments in Electric Rate
Schedules and Tariffs and Request for an Accounting Order (**Docket No. 2018-318-E**)

Dear Ms. Boyd:

By this letter, the South Carolina State Conference of the NAACP, the South Carolina Coastal Conservation League and Upstate Forever (“SC NAACP *et al.*”) hereby notify the Public Service Commission of South Carolina (“Commission”) that they concur with the South Carolina Office of Regulatory Staff (“ORS”) recommendation that Duke Energy Progress, LLC (“DEP” or “Company”) be required to continue to track and report quantifiable savings related to Advanced Metering Infrastructure (“AMI”) deployment, consistent with Commission Order No. 2019-341.

The Commission should deny the Company’s request to terminate further annual reports regarding savings related to AMI deployment. Instead, the Commission should require DEP to continue to track and report these savings, including but not limited to all savings associated with customer order fulfillment, remote reading of meters, and outage restoration. In support of DEP’s request to defer projected AMI costs, witness Donald Schneider testified to the numerous benefits of AMI. In addition to outage restoration and remote fulfillment and meter reading, witness Schneider testified that AMI enables greater customer control over energy consumption, as well as enhanced customer services and programs. The Commission should hold DEP accountable for delivering these savings. In addition, AMI enables the development of dynamic rate designs that shift usage to times when it is less expensive, which not only help participating customers save money on their bills but also result in system-wide savings that benefit all ratepayers. In addition, data from AMI deployment is integral to the Company’s nascent integrated systems and operation planning process, which will also provide opportunities for DEP to achieve meaningful cost savings. DEP should quantify all AMI benefits to the greatest extent possible.

SC NAACP *et al.* respectfully request that the Commission direct the Company to continue to track all quantifiable savings related to AMI meter deployment, and to file

annual reports of these savings until its next rate proceeding. Please do not hesitate to contact me, should you have any questions.

Sincerely,

s/ J. Blanding Holman, IV

J. Blanding Holman, IV

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)